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BellSouth Telecommunications, Inc  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

TRA DOCKET ROOM  
March 26, 2004

Guy M. Hicks  
General Counsel

615 214 6301  
Fax 615 214 7406

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's  
Triennial Review Order (Nine-month Proceeding)(Switching)*  
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH ch

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

|                               |   |                    |
|-------------------------------|---|--------------------|
| In Re:                        | ) |                    |
|                               | ) | Docket No 03-00491 |
| IMPLEMENTATION OF THE FEDERAL | ) |                    |
| COMMUNICATIONS COMMISSION'S   | ) |                    |
| TRIENNIAL REVIEW ORDER – 9    | ) |                    |
| MONTH PROCEEDING – SWITCHING  | ) |                    |

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FOURTH SUPPLEMENTAL  
RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL  
STATES, LLC'S FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following Fourth Supplemental Responses to the First Set of Interrogatories served by AT&T Communications of the South Central States, LLC's ("AT&T") dated October 27, 2003 and states as follow:

BellSouth incorporates herein by reference all of its general and specific objections filed on November 6, 2003. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections

**FOURTH SUPPLEMENTAL RESPONSES**

**REQUEST:** Has BellSouth's "bulk" hot cut process been subjected to testing, third-party or otherwise? If so, please provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.

**RESPONSE:** As part of its case development for presentation in response to the FCC's Triennial Review Order, BellSouth, at the direction of counsel, is evaluating how best to present its case regarding its' bulk hot cut process, and that may involve evaluations based on some sort of objective testing of the process both internal and external. No final decision has been made regarding such a presentation and no third party test has been conducted.

**SUPPLEMENTAL RESPONSE:**

In conjunction with demonstrating the efficiency of its batch hot cut process, BellSouth has retained PricewaterhouseCoopers to conduct a third-party evaluation of BellSouth's batch hot cut process. The test currently is on-going, BellSouth will supplement this response when the test is completed.

**SECOND SUPPLEMENTAL RESPONSE:**

For information responsive to this request, see the Direct Testimony of Milton McElroy, Jr. filed January 16, 2004, Exhibits MM-1 and MM-2.

REQUEST: Please provide the maximum number of lines that can be converted (per day) to UNE-L using:

- (a) a "bulk" hot cut process per CO and for Florida as a whole; and
- (b) an individual hot cut process per CO and for Florida as a whole.

RESPONSE:

- a) BellSouth's bulk hot cut process is scalable depending on volumes
- b) BellSouth's individual hot cut process is scalable depending on volumes.

SUPPLEMENTAL RESPONSE:

There is no set number of hot cuts that BellSouth has established for either "bulk" or individual hot cuts for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met.

SECOND SUPPLEMENTAL RESPONSE:

There is no set number of hot cuts that BellSouth has established for either "bulk" or individual hot cuts for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met. In the batch hot cut process, BellSouth can perform at least 125 hot cuts per central office per day. BellSouth's process is scalable to handle volumes above 125 cuts per central office per day. For the number of individual hot cuts performed by BellSouth on a daily basis, see BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item No. 4.

**REQUEST:** Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.

**RESPONSE:** BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth has attached responsive information relating to residential lines. This information is proprietary and is being provided pursuant to the terms of the parties' protective agreement.

The information in this attachment is based on data from BellSouth's retail billing records from April 2003, and estimates of revenue figures that are not available directly from BellSouth's data, such as toll estimates. Further this is average revenue per residential line based on BellSouth's data and may not reflect the performance of a hypothetical CLEC.

The revenue categories in the attachment are defined as follows:

- "Local" includes local service (i.e., basic residence line), local usage, EUCL, OS/DA, and vertical C.O. features.
- "Toll" includes estimates of intraLATA toll, interLATA toll, international, and credit card calls.
- "Other" includes originating and terminating access, inside wire maintenance, voicemail, DSL.

On November 20, 2003, AT&T clarified that the term "small business lines" refers to lines that are DS0/2-wire analog loops. With this clarification, BellSouth is currently in the process of gathering this information and will supplement this response as soon as possible, but in any event, no later than December 12, 2003.

**SUPPLEMENTAL RESPONSE:**

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth states the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

**SECOND SUPPLEMENTAL RESPONSE:**

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth states that the information previously provided in response to this request was erroneous. The corrected information is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

**REQUEST:** For the BellSouth access lines that are currently provisioned on IDLC/NGDLC technology as described in the response to Interrogatory No. 20 above, please state the percentage of such access lines for which BellSouth has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

**RESPONSE:** Information responsive to this request is contained in BellSouth's response to AT&T's First Set of Interrogatories, Attachment to Item No. 23, in Georgia Public Service Commission Docket No. 11749-U filed on November 10, 2003.

**SUPPLEMENTAL RESPONSE:**

Information responsive to this request is available on the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-03-26/>

The file name format is TN\_Supp\_Rsp\_to\_AT&T\_Inter\_Attach\_23.pdf. (see columns labeled "% compatible spares" and "total IDLC loops"). To ascertain "parallel copper" and "UDLC facilities available for hot cut conversions", only loop feeder facilities are considered. Additionally, the column labeled "total IDLC loops" includes only loops served by Integrated NGDLC systems.

REQUEST: Provide, for each individual CO, end office, and serving wire center:

- (a) total collocation space;
- (b) total collocation space currently occupied by carriers;
- (c) names of carriers currently occupying collocation space;
- (d) total collocation space held or occupied by carriers who are no longer operating; and
- (e) total collocation space available for carriers.

RESPONSE: BellSouth objects to Interrogatory 40, subpart (c), on the grounds that it seeks information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007. Subject to this objection, and without waiving this objection, BellSouth is currently in the process of compiling responsive information for subparts (a), (b), (d), and (e). Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

**SUPPLEMENTAL RESPONSE:**

- (a) Information concerning the approximate square footage of collocation floor space for each individual CO, end office and serving wire center in BellSouth's nine-state region in which there are currently collocators is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name format is inter\_attach\_40a. BellSouth designates individual CO, end office and serving wire center floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space" until the carrier physically removes its equipment and the collocation arrangement is reduced or terminated.



SUPPLEMENTAL RESPONSE (Cont'd):

- (b) The aggregate amount of collocation space currently occupied by carriers in BellSouth's COs, end offices and serving wire centers in BellSouth's nine-state region is provided in the response to Item No. 40(a) above.
- (c) BellSouth objects to this request on the grounds that it seeks information that is not relevant and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007.
- (d) Information concerning the approximate square footage of collocation space held or occupied by carriers who are no longer in operation (i.e., carriers that are out of business or have filed for bankruptcy) in BellSouth's nine-state region is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>  
  
The file name format is inter\_attach\_40d.
- (e) Information concerning those COs, end offices and wire centers in BellSouth's nine-state region in which collocation space currently exists is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file format is inter\_attach\_40e. Collocation space is available in all of BellSouth's COs, end offices and wire centers in BellSouth's nine-state region, with the exception of the following three offices: J. Turner Butler CO in Jacksonville, Florida (CLLI Code: JCVLFLJT), Lake Mary Main CO in Lake Mary, Florida (CLLI Code: LKMRFLMA), and the Old Dowd CO in Charlotte, North Carolina. These three offices are contained on BellSouth's Space Exhaust List, which is posted on BellSouth's website at:

[http://interconnection.bellsouth.com/notifications/carrier/carrier\\_pdf/91081451-C.pdf](http://interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91081451-C.pdf)

SECOND SUPPLEMENTAL RESPONSE.

- (a) The information previously provided in response to this request for the states of Louisiana, Mississippi, North Carolina and South Carolina was erroneous. Information concerning the approximate square footage of collocation floor space for each individual CO, end office and serving wire center in BellSouth's nine-state region in which there are currently collocators, including corrected information in these four states, is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-25>

The file name format is:

GA\_17749-U\_BST\_5th\_Supplement\_to\_ATT\_1st\_Inter\_Attach\_40a.

BellSouth designates individual CO, end office and serving wire center floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space"

- (e) BellSouth previously provided a list of those COs, end offices and wire centers in BellSouth's nine-state region in which there is currently collocation space available. BellSouth also provides collocation space availability information to CLECs via a "Space Availability Report" pursuant to CFR §51.323. Upon request from a carrier and at the carrier's expense, BellSouth will provide a written report describing in detail the space that is available for collocation at a particular CO. This report includes not only the amount of collocation space available at the CO requested, but also the number of collocators present at the CO, any modifications in the use of the space since the last report on the CO requested (if a previous report had been performed), and the measures BellSouth is taking to make additional space available for collocation arrangements. However, a Space Availability Report does not reserve space at the CO for which the report was requested. The interval for providing this report is negotiable when information on more than five COs is requested at the same time.

SECOND SUPPLEMENTAL RESPONSE (Cont'd):

BellSouth does not keep a running total of how much collocation space is available in each CO. The amount of collocation space available in each individual CO, end office and serving wire center could conceivably change from day to day or even many times throughout the day, depending upon the number of applications BellSouth receives from carriers for new collocation space, the augmentation or termination of existing collocation space, and the reservation of future collocation space (up to 18 months in Florida and up to 24 months in all other states). Furthermore, the amount of space available in an individual CO could also change based on space that is utilized or reserved (up to 18 months in Florida and up to 24 months in all other states by BellSouth for its own operations during the course of the day.

**REQUEST:** Please identify any telecommunications companies (including ILECs or CLECs) that BellSouth has identified as being willing to provide, intending to provide, or currently making available wholesale unbundled local switching used in combination with unbundled analog loops obtained from BellSouth to CLECs.

- (a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a wholesale provider.
- (b) Has BellSouth identified any vendors, other than any telecommunications company that are willing to offer switching capabilities to CLECs? If the answer is "yes," please provide name, address, and telephone number of each identified vendor.

**RESPONSE:** BellSouth is in the process of identifying such telecommunications carriers. BellSouth anticipates identifying such carriers, at least in part, via discovery in this proceeding.

**SUPPLEMENTAL RESPONSE:**

BellSouth has not identified the requisite number of wholesale switch providers in Tennessee that would satisfy the Federal Communications Commission's ("FCC") wholesale switching triggers.

REQUEST: For each carrier listed in Interrogatory No. 50, please provide for each switch BellSouth claims provides a wholesale alternative:

- (a) The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (e.g., stand-alone, host, or remote).
- (b) For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office.
- (c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch.
- (d) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ...) provisioned to each collocation:
  - i) Within the last 3 months;
  - ii) Within the last 6 months; and
  - iii) Within the past year.
- (e) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ...) in-service at each collocation as of September 30, 2003.

RESPONSE: See BellSouth's Response to AT&T's First Set of Interrogatories, Item No. 50.

**SUPPLEMENTAL RESPONSE:**

See BellSouth's Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 50.

**REQUEST:** Identify by wire center in BellSouth's nine-state region each unaffiliated competitive switch provider that BellSouth asserts qualifies as a self provider and detail the basis upon which you believe such entity qualifies as a self provider, including the geographic markets within which each unaffiliated competitive switch provider is providing service and the product and customer markets reached by each unaffiliated competitive switch provider.

- (a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a self-provider.

**RESPONSE:** See BellSouth's response to AT&T's First Set of Interrogatories, Item No. 50.

**SUPPLEMENTAL RESPONSE**

The information responsive to this request is contained in Exhibit PAT-5 to the Direct Testimony of Pamela A. Tipton. Additional information responsive to this request is contained in BellSouth's Responses to AT&T's Second Set of Interrogatories, Item Nos. 113 through 116 and BellSouth's Second Supplemental Responses to AT&T's Second Set of Interrogatories, Item Nos. 113, 114 and 116.

REQUEST: For each carrier listed in Interrogatory No. 52, please provide for each switch BellSouth claims is used for self provisioning:

- (a) The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (e.g., stand-alone, host, or remote).
- (b) For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office.
- (c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch.
- (d) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ...) provisioned to each collocation:
  - (i) Within the last 3 months;
  - (ii) Within the last 6 months; and
  - (iii) Within the past year.
- (e) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ...) in-service at each collocation as of September 30, 2003.

RESPONSE: See BellSouth's response to AT&T's First Set of Interrogatories, Item No. 52.

**SUPPLEMENTAL RESPONSE:**

See BellSouth's Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 52. Additional information responsive to this request is contained in BellSouth's Responses to AT&T's Second Set of Interrogatories, Item Nos. 113 through 116 and BellSouth's Second Supplemental Responses to AT&T's Second Set of Interrogatories, Item Nos. 113, 114 and 116

**REQUEST:** For the most recent quarter for which information is available, provide by applicable CLLI code the number of:

- (a) Analog loops provided to competitive carriers with unbundled local switching (i.e., UNE-P lines);
- (b) Analog loops provided to competitive carriers without unbundled local switching. (UNE-L); and
- (c) The number of CLECs who are collocated in that wire center and indicate the number of such CLECs who currently have analog (copper) cross connection capability to the BellSouth MDF; and
- (d) The number of small business lines (based on DSO/DS1 cutoff) and number of residential lines.

**RESPONSE:** (a) BellSouth is currently in the process of gathering this information for each CO in BellSouth's nine-state region. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

- (b) See BellSouth's Response to Item (a) above.
- (c) See BellSouth's Response to Item (a) above.
- (d) To the extent this information is available, it has been or will be provided in BellSouth's response to AT&T's First Set of Interrogatories, Item No. 21.

**SUPPLEMENTAL RESPONSE:**

- (a) The information responsive to this request is available via the following URL link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name format is inter\_attach\_55. The information responsive to this request is located under the Column labeled "Total Analog UNE-P Lines."



**SUPPLEMENTAL RESPONSE (Cont'd):**

- (b) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "Total Analog UNE-L Loops." For purposes of this response, "Total Analog UNE-L Loops" includes SL1, SL2, and UCL-ND loop types.
- (c) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "No. of Collocated CLECs."
- (d) To the extent this information is available, it has been provided in BellSouth's response to Interrogatory Item No. 21.

**SECOND SUPPLEMENTAL RESPONSE:**

- (b) The information previously provided in response to this request for the states of Alabama, Louisiana, and North Carolina was erroneous. Corrected information concerning the number of analog loops provided to competitive carriers without unbundled local switching in these three states is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-02>

The file name GA\_17749-U\_AT&T\_1<sup>st</sup>\_Attach\_Inter\_55b. The corrected information responsive to this request is located under the Column labeled "Total Analog UNE-L Loops." For purposes of this response, "Total Analog UNE-L Loops" includes SL1, SL2, and UCL-ND loop types.

REQUEST: For the most recent quarter available, provide the:

- a) Number of business premises with a single analog line;
- b) Number of business premises with two analog lines;
- c) Number of business premises with three analog lines;
- d) Number of business premises with four analog lines;
- e) Number of business premises with six analog lines;
- f) Number of business premises with seven analog lines;
- g) Number of business premises with eight analog lines;
- h) Number of business premises with nine analog lines;
- i) Number of business premises with ten analog lines;
- j) Number of business premises with eleven analog lines;
- k) Number of business premises with twelve analog lines;
- l) Number of business premises with thirteen analog lines;
- m) Number of business premises with a fourteen analog line;
- n) Number of business premises with fifteen analog lines;
- o) Number of business premises with sixteen analog lines;
- p) Number of business premises with seventeen analog lines;
- q) Number of business premises with eighteen analog lines;
- r) Number of business premises with nineteen analog lines;
- s) Number of business premises with twenty analog lines;
- t) Number of business premises with twenty-one analog lines;
- u) Number of business premises with twenty-two analog lines;
- v) Number of business premises with twenty-three analog lines;
- w) Number of business premises with twenty-four analog lines; and
- x) Number of business premises with more than twenty-four analog lines.

RESPONSE: Information responsive to this request is contained in BellSouth's response to AT&T's First Set of Interrogatories, Attachment to Item No. 62, in Georgia Public Service Commission Docket No. 17749-U filed on November 10, 2003.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 03-00491  
AT&T's 1<sup>st</sup> Interrogatories  
October 27, 2003  
**SUPPLEMENTAL RESPONSE** Item No. 62  
Page 2 of 2

**SUPPLEMENTAL RESPONSE:**

BellSouth states that the information previously provided in response to this request was erroneous. The corrected information is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Fourth Supplemental Responses to AT&T's First Set of Interrogatories, Item No. 62, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

**REQUEST:** In BellSouth's nine-state region, please identify, by name and location, any of BellSouth's Central Offices that do not have fiber connectivity for purposes of interoffice transport.

**RESPONSE:** All of BellSouth's Central Offices in the nine-state region have fiber connectivity for interoffice transport, except:

Pleasureville – 1250 Main Street, Pleasureville, Georgia

Lafayette – S. Main Street, Lafayette, Tennessee, Georgia

Trenton – 290 5<sup>th</sup> Street, Trenton, Tennessee, Georgia

**SUPPLEMENTAL RESPONSE**

All of BellSouth's Central Offices in the nine-state region have fiber connectivity for interoffice transport, except:

Pleasureville – 1250 Main Street, Pleasureville, Kentucky

Lafayette – S. Main Street, Lafayette, Kentucky

Trenton – 290 5<sup>th</sup> Street, Trenton, Kentucky

**REQUEST:** In BellSouth's nine-state region, in BellSouth's Central Offices that currently have one or more collocators, please provide the following information for each of those central offices:

- a) Name and location of the central office;
- b) The exchange served by the central office;
- c) The number of collocations by collocation type;
- d) The total amount of space currently being used by collocators;
- e) The total amount of space available for use by collocators (which does not include space reserved for your company or its affiliates);
- f) Names of carriers currently occupying collocation space;
- g) The date the carriers took occupancy;
- h) Collocation space held by carriers who are currently in bankruptcy proceedings;
- i) Collocation space occupied by CLECs no longer operating;
- j) Whether the CO is manned or unmanned;
- k) The number of cross-connects in service to the wire center; and
- l) The number of UNE loops provisioned to each collocating carrier in the past 3 months.

**RESPONSE:** BellSouth objects to Interrogatory 88, subparts (f) and (g) on the grounds that it seeks information not related to this proceeding and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information rules, 47 CFR §64.2007. Subject to these objections, and without waiving these objections, information responsive to subpart (l) is attached. BellSouth is currently in the process of compiling responsive information for the remaining subparts. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

SUPPLEMENTAL RESPONSE:

- (a) The name and location of each BellSouth Central Office in BellSouth's nine-state region that currently has one or more collocators are available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>  
  
The file name format is inter\_attach\_88a.
- (b) The name of the exchange served by each BellSouth Central Office in which there are one or more collocators in BellSouth's nine-state region is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>  
  
The file name format is inter\_attach\_88a.
- (c) The number of collocation arrangements by collocation type (physical and virtual) for each BellSouth Central Office in BellSouth's nine-state region is available via the following URL link.  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>  
  
The file name format is inter\_attach\_88c.
- (d) See BellSouth's Supplemental Response to Interrogatory Item No. 40(b).
- (e) See BellSouth's Supplemental Response to Interrogatory Item No. 40(e).
- (f) BellSouth objects to this request on the grounds that it seeks information not relevant to this proceeding and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information rules, 47 CFR §64.2007.
- (g) BellSouth objects to this request on the grounds that it seeks information not relevant to this proceeding and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information rules, 47 CFR §64.2007.

SUPPLEMENTAL RESPONSE (Cont'd.):

- (h) See BellSouth's Supplemental Response to Interrogatory Item No. 40(d).
- (i) See BellSouth's Supplemental Response to Interrogatory Item No. 40(d).
- (j) See BellSouth's Supplemental Response to Interrogatory Item No. 1.
- (k) The number of cross-connects that are in-service in each BellSouth Central Office in BellSouth's nine-state region is available via the following URL link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name format is inter\_attach\_88k.

- (l) Information concerning the number of UNE loops provisioned to collocating carriers without disclosing CPNI information is available via the following URL link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name format is inter\_attach\_88l.

SECOND SUPPLEMENTAL RESPONSE:

- (a) The information previously provided in response to this request for the states of Louisiana, Mississippi, North Carolina and South Carolina was erroneous. Information concerning the name and location of each BellSouth Central Office in BellSouth's nine-state region that currently has one or more collocators, including the corrected information in these four states, is available via the following URL link  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-25>

The file name format is:

GA\_17749-U\_BST\_5th\_Supplement\_to\_ATT\_1st\_Inter\_Attach\_88a.

SECOND SUPPLEMENTAL RESPONSE (Cont'd.):

- (c) The information previously provided in response to this request for the states of Louisiana, Mississippi, North Carolina and South Carolina was erroneous. Information concerning the number of collocation arrangements by collocation type (physical and virtual) for each BellSouth Central Office in BellSouth's nine-state region, including corrected information in these four states, is available via the following URL  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-25>

The file name format is:

GA\_17749-U\_BST\_5th\_Supplement\_to\_ATT\_1st\_Inter\_Attach\_88c.



**REQUEST:** In BellSouth's nine-state region, identify the number of BellSouth's Central Offices in which there are no current collocation arrangements provided to CLECs. Of the number identified, please identify name and location of the central office, and state whether the CO is manned or unmanned.

**RESPONSE:** BellSouth is currently in the process of compiling the number of BellSouth Central Offices in BellSouth's nine-state region in which there are no current collocation arrangements provided by BellSouth to CLECs. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

**SUPPLEMENTAL RESPONSE:**

In BellSouth's nine-state region, there are 1,042 Central Offices in which BellSouth is providing no collocation arrangements to CLECs. Information concerning the Name and Location of the BellSouth Central Offices in BellSouth's nine-state region in which there are no current collocation arrangements provided by BellSouth to CLECs is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name format is inter\_attach\_89. See BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item No. 1, as to whether or not these COs are manned or unmanned.

**SECOND SUPPLEMENTAL RESPONSE:**

The information previously provided in response to this request for the states of Louisiana, Mississippi, North Carolina and South Carolina was erroneous.

SECOND SUPPLEMENTAL RESPONSE (Cont'd):

In BellSouth's nine-state region, there are 1,029 Central Offices in which BellSouth is providing no collocation arrangements to CLECs. Information concerning the Name and Location of the BellSouth Central Offices in BellSouth's nine-state region in which there are no current collocation arrangements provided by BellSouth to CLECs, including the corrected information in these four states, is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2004-02-25>

The file name format is:

GA\_17749-U\_BST\_5th\_Supplement\_to\_ATT\_1st\_Inter\_Attach\_89.

Respectfully submitted, this 26<sup>th</sup> day of March, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

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Guy Hicks  
Joelle J. Phillips  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300  
(614) 214-6301

R. Douglas Lackey  
Andrew D. Shore  
Meredith E. Mays  
Suite 4300, BellSouth Center  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0750

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## CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Henry Walker, Esquire  
Boult, Cummings, et al.  
414 Union Street, #1600  
Nashville, TN 37219-8062  
[hwalker@boultcummings.com](mailto:hwalker@boultcummings.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219  
[cwelch@farrismathews.com](mailto:cwelch@farrismathews.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Martha M. Ross-Bain, Esquire  
AT&T  
1200 Peachtree Street, Suite 8100  
Atlanta, Georgia 30309  
[rossbain@att.com](mailto:rossbain@att.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Timothy Phillips, Esquire  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, Tennessee 37202  
[timothy.phillips@state.tn.us](mailto:timothy.phillips@state.tn.us)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823  
[don.baltimore@farrar-bates.com](mailto:don.baltimore@farrar-bates.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

James Wright, Esq.  
United Telephone - Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587  
[james.b.wright@mail.sprint.com](mailto:james.b.wright@mail.sprint.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Ms. Carol Kuhnnow  
Qwest Communications, Inc.  
4250 N. Fairfax Dr.  
Arlington, VA 33303  
[Carol.kuhnnow@qwest.com](mailto:Carol.kuhnnow@qwest.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062  
[jhastings@boultcummings.com](mailto:jhastings@boultcummings.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Dale Grimes, Esquire  
Bass, Berry & Sims  
315 Deaderick St., #2700  
Nashville, TN 37238-3001  
[dgrimes@bassberry.com](mailto:dgrimes@bassberry.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Mark W. Smith, Esquire  
Strang, Fletcher, et al.  
One Union Square, #400  
Chattanooga, TN 37402  
[msmith@sf-firm.com](mailto:msmith@sf-firm.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Nanette S. Edwards, Esquire  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Guilford Thornton, Esquire  
Stokes & Bartholomew  
424 Church Street, #2800  
Nashville, TN 37219  
[gthornton@stokesbartholomew.com](mailto:gthornton@stokesbartholomew.com)

☐ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight  
☒ Electronic

Marva Brown Johnson, Esquire  
KMC Telecom  
1755 N. Brown Road  
Lawrenceville, GA 30043  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Ken Woods, Esquire  
MCI WorldCom  
6 Concourse Parkway, #3200  
Atlanta, GA 30328  
[Ken.woods@mci.com](mailto:Ken.woods@mci.com)



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